

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MARY ELLEN JOHNSON, §
§
Plaintiff, §
§
v. § CASE NO. 5:15-CV-00297-FB-HJB
§
SOUTHWEST RESEARCH INSTITUTE, §
§
Defendant. §

DEFENDANT SOUTHWEST RESEARCH INSTITUTE'S UNOPPOSED MOTION TO EXCEED PAGE LIMITS ON DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

NOW COMES Defendant Southwest Research Institute ("SwRI") and files this Unopposed Motion to Exceed Page Limits on Defendant's Motion for Summary Judgment, and in support shows the Court as follows:

As this Court is aware, Plaintiff's former position involved the handling of classified information and therefore required a government security clearance. In challenging her termination, this case requires an in depth analysis of the *Egan* Doctrine and Title VII's national security exemption which adds to the complexity of the suit. The arguments presented in Defendant's Motion for Summary Judgment are necessary to address all the legal issues presented by Plaintiff's claims. Accordingly, Defendant respectfully requests leave to file its Motion for Summary Judgment in excess of the applicable page limitations. As required, attached hereto as Exhibit A is Defendant's Motion for Summary Judgment, for which Defendant seeks leave of this Court to file. Plaintiff is not opposed to this Motion to Exceed Page Limits.

WHEREFORE, Defendant Southwest Research Institute respectfully requests that the Court grant its Unopposed Motion to Exceed Page Limits on Defendant's Motion for Summary

Judgment and that the Court accept for filing and docketing Defendant's Motion for Summary Judgment attached hereto as Exhibit A.

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Mario A. Barrera
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Attorneys for Defendant
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CERTIFICATE OF CONFERENCE

I hereby certify that on March 29, 2017, counsel for Defendant Southwest Research Institute conferred with counsel for Plaintiff regarding the substance of this Motion. Plaintiff is unopposed to the relief sought herein.

/s/ Mario A. Barrera
Mario A. Barrera

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2017, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

Robert J. Wiley
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/s/ Mario A. Barrera

Mario A. Barrera